

ORIGINAL

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

PLAINTIFF

v

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

DEFENDANT

DISTRICT COURT

No. 04-251 JJF

JURY TRIAL

NOTICE OF MOTION

**MOTION FOR ENLARGEMENT OF TIME FOR RESPONSE OF
PLAINTIFF TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Ashley Adams, requesting MOTION FOR ENLARGEMENT OF TIME FOR RESPONSE OF PLAINTIFF TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT, setting forth the reasons as follows, to be heard at the Court's convenience.



Ashley Adams
July 16, 2007

RGJ:MM
2007 JUL 16 AM 11:43
FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

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MOTION

**MOTION FOR ENLARGEMENT OF TIME FOR RESPONSE OF
PLAINTIFF TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Ashley Adams, pro se, hereby moves this
Honorable Court for enlargement of time for response of Plaintiff to
Defendant's Motion for SUMMARY JUDGMENT and, in support thereof,
states the following:

(1)

This suit arises out of an automobile accident that occurred
April 23, 2002, whereby Jo Ellen Chapen Sheldon negligence operation of
a motor vehicle causing severe bodily injury to Ashley Adams.

(2)

Plaintiff, Adams, pro se, periodically initiates contact with the defense counsel, Beth Christman, to determine status of the case and disposition on open motions, to resolve any outstanding issues in the proceedings.

(3)

Approximately three days prior to the receipt of Adams receiving the Motion for Summary Judgment, Adams had a telephone conversation with Beth Christman, defense attorney, regarding the scheduling order. Adams specifically addressed the question “of any outstanding items needed by the defense attorney, Beth Christman” and defense attorney, Beth Christman agreed that everything was completed awaiting the pre-trial hearing October 04, 2007.

(4)

Adams relied on defense counsels response as accurate, and forthcoming, to only be served a Motion for Summary Judgment, a few days after the conversation with Defense Attorney, Beth Christman.

(5)

On July 2, 2007, Plaintiff, Ashley Adams spoke with Defense Attorney, Beth Christman agreeing that the defense attorney has the expert reports that Defense Attorney, Beth Christman claims not to have in her Motion for Summary Judgment, despite the filing of her Motion on

June 27, 2007. Defendant's Motion for Summary Judgment item (2) Defendant states "Plaintiff has not supplied such reports from any expert" contradicts the conversation with Plaintiff that stated by Beth Christman, "that Beth Christman has the medical expert reports.

(6)

Seemingly, this Motion for Summary Judgment basis is filed due to lack of communication or misunderstanding of information between Defense Attorney, Beth Christman and *pro se* Plaintiff, Ashley Adams, because Plaintiff, Ashley Adams, has many qualified physicians with documentation that presents her fractured neck at C6-C7 as a result of the automobile injuries sustained on April 23, 2007, negligently caused by Defendant, Jo Ellen Chapen Sheldon.

(7)

These medical documents represented in item (6) are in the possession of Defense Attorney, Beth Christman; to resubmit these reports would be duplicating efforts and a time consuming event, especially in light of duplicating the procedure.

(8)

On July 13, 2007, Plaintiff, Ashley Adams spoke with Defense Attorney, Beth Christman, at approximately 12:05PM. Plaintiff, Ashley Adams asked Defense Attorney, Beth Christman if she would have any

objections to Plaintiff, Ashley Adams filing a request with the Court for a 15day extension or as needed to respond to her Motion for Summary Judgment; Defense Attorney, Beth Christman, stated "no objection to the request for extension of time".

WHEREFORE, Plaintiff Ashley Adams asks this Honorable Court to grant an extension of time for her response to Defendant's Motion for Summary Judgment. Currently a Motion filed by Plaintiff, Ashley Adams was filed on July 02, 2007 to decide the procedures for filing a summary judgment motion, section of Scheduling Order states:

4. Case Dispositive Motions. Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before July 2, 2007. **The court will issue a separate Order regarding procedures for filing summary judgment motions.** Plaintiff is not aware of any such order in existence and Plaintiff requires the procedures in order to respond appropriately.

A handwritten signature in black ink that reads "Ashley Adams". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Ashley Adams, *Pro Se*, Plaintiff
PO Box 7652
Newark, DE 19714

302-393-3525

Dated July 16, 2007

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DISTRICT COURT

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ORDER

IT IS HEREBY ORDERED this ____ day of _____ 2007 that
Plaintiff, Ashley Adams' MOTION FOR ENLARGEMENT OF TIME FOR
RESPONSE OF PLAINTIFF TO DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT is **GRANTED**.

United States District Judge

**UNITED STATES DISTRICT COURT
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PLAINTIFF

v

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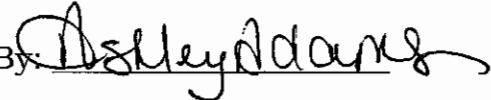
DISTRICT COURT

No. 04-251 JJF

JURY TRIAL

REQUEST FOR A HEARING

Plaintiff, Ashley Adams hereby requests a Hearing on its MOTION
FOR ENLARGEMENT OF TIME FOR RESPONSE OF PLAINTIFF TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT.

By: 

Ashley Adams
PO Box 7652
Newark, DE 19714
302-393-3525
Plaintiff, pro se

FILING DATE: July 16, 2007

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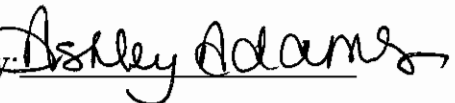
No. 04-251 JJF

JURY TRIAL

NOTICE OF SERVICE

I hereby give notice that I caused two (2) true and correct copies of the foregoing MOTION FOR ENLARGEMENT OF TIME FOR RESPONSE OF PLAINTIFF TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT to be served upon the following on the date set forth below, via first class mail, postage prepaid, and/or hand-delivered:

Beth H Christman
CASARINO, CHRISTMAN, & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: 

Ashley Adams
PO Box 7652
Newark, DE 19714
Plaintiff, *pro se*

Dated: July 16, 2007

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FOR THE DISTRICT OF DELAWARE**

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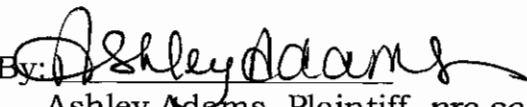
JURY TRIAL

TO: The United States District Court
For the District of Delaware
The Honorable Judge Joseph J Farnan, Jr
844 N King Street
Lock Box 44
Wilmington, DE 19801

NOTICE OF SERVICE

I hereby give notice that I caused notification by letter for
MOTION FOR ENLARGEMENT OF TIME FOR RESPONSE OF PLAINTIFF
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT to be served
upon the following on the date set forth below, via first class mail,
postage prepaid and/or hand-delivered:

Beth H Christman
CASARINO, CHRISTMAN, & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: 
Ashley Adams, Plaintiff, *pro se*
PO Box 7652
Newark, DE 19714

FILING DATE: July 16, 2007